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January 30, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, D.C. 20554

Received & Inspected

5/2018

FCI Room

DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

Thank you for the opportunity to comment on the FCC's Notice of Proposed Rulemaking, WC Docket No. 17-108, "Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment."

Many of our approximately 775,000 members are highly skilled utility and telecommunications professionals working throughout the infrastructure networks that are vital to the flow of modern life. IBEW members log years of on-the-job and classroom training in apprenticeship programs and as line workers across the United States.

IBEW members are employed in every aspect of the utility and telecommunications industries, including the physical infrastructure working as linemen and groundmen, technicians, equipment operators, mechanics as well as substation electricians and communications technicians. Delivering electric power and communications services can be hazardous work. Our members know the system and the risks, better than anyone.

The IBEW's interests in the policies governing telecommunications equipment attached to energy infrastructure are as practical as is gets, as IBEW members are literally on the front lines of network maintenance and development. Any changes to pole networks should protect the safety and reliability of the grid and communications network, and those who work on it.

The IBEW has areas of concern to advise the Commission to consider while contemplating new regulations that would affect our members. These include pole congestion, safe access to perform pole work and the effect of RF radiation on linemen working on poles.

To prevent congestion on utility poles, any new FCC regulation should specify that all National Electrical Safety Code (NESC) standards and those utility-specific standards be maintained for distance between communications equipment and utility space for high voltage wires and devices. It is vital that NESC ground rules and guidelines for the practical safeguarding of utility workers and the public continue to be followed during the installation, operation, and maintenance of electric supply, communication lines and associated equipment.

For more than 126 years, safety has remained a hallmark of the IBEW, as the electric system poses inherent hazards. The safety of members and the public is our most solemn commitment, and ease of access to workspaces is vital for worker safety. The IBEW urges the FCC to maintain that all pole attachments be placed in such a manner

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that a worker can safely climb onto and work from the pole, whether in the communications space or the utility space. As IBEW members know too well, not every power or communication line can be reached by bucket truck lifts, and often linemen need to climb, hand over fist, to perform a repair. Ad hoc placement of pole attachments can inhibit this work, and endanger the worker. Only highly qualified utility linemen should be allowed to perform work in the utility space for emergency and maintenance.

Another potential hazard in working on or near communications networks is exposure to radiofrequency radiation from wireless, broadcast and microwave transmitters which have proliferated in recent years on utility poles. To prevent exposure to hazardous RF while working in the communications or utility space on poles, cellular devices of any size should be placed outside of the work areas to provide a safe work space for emergency response or routine maintenance work.

The IBEW recognizes and embraces technology's role in making our cities smarter, more efficient and more sustainable and the role of smart cities technologies in improving energy and communications services. Such new innovations have powerful potential to attract business investment while providing new opportunities for our members.

As well, the IBEW supports one-touch make-ready (OTMR) to streamline pole attachment work, but only outside the utility space. Indeed, our support for OTMR is conditional, provided it does not violate existing collective bargaining agreements or create an unsafe work environment. Our members have seen the work of third-party contractors who have used weak bolts to secure heavy cables or left ungrounded strands, posing electrocution risks to linemen or to the general public.

The IBEW understands the desire to streamline rules to deploy and build the infrastructure necessary for advanced modern communications. As skilled professionals, the IBEW welcome the opportunity for the new jobs this buildout provides. But it should not come at the expense of the safety of our line workers, the general public or the reliability of the electrical grid from poles overburdened by cable and hardware devices.

To this end, the IBEW advocates increasing coordination among utility and communications companies and their contractors, as well as greater attention paid to protocol and safety in the interest of system integrity. To fully investigate the implications of changes to pole attachment regulations, the IBEW recommends these changes be considered by the Broadband Deployment Advisory Committee. Thank you for the opportunity to provide our comments on the important work of the Commission.

Sincerely yours,

A handwritten signature in black ink, reading "Lonnie R. Stephenson".

Lonnie R. Stephenson
International President

LRS:mlm